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Attorneys for Tulare Local Healthcare District,  
dba Tulare Regional Medical Center

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE  
DISTRICT, dba TULARE  
REGIONAL MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897  
Address: 869 N. Cherry Street  
Tulare, CA 93274

CASE NO. 17-13797

DC No.: WW-34

Chapter 9

Date: N/A  
Time: N/A  
Place: 2500 Tulare Street  
Fresno, CA 93721  
Courtroom 13  
Dept. B, Fifth Floor  
Judge: Honorable René Lastreto II

STIPULATION FOR RELIEF FROM THE AUTOMATIC STAY  
PURSUANT TO 11 U.S.C. § 362

TULARE LOCAL HEALTHCARE DISTRICT, dba Tulare Regional Medical Center  
(the "District") and SENOVIA GUTIERREZ ("Plaintiff"), by and through their respective  
counsel, hereby enter into the within Stipulation for Relief from the Automatic Stay  
pursuant to 11 U.S.C. § 362 (the "Stipulation"). The Stipulation is made with reference  
to the following:

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RECITALS

1. On September 30, 2017, the District commenced a voluntary case under chapter 9 of title 11 of the United States Bankruptcy Code in the United States Bankruptcy Court, Eastern District of California ("Petition Date").

2. Prior to the Petition Date, Plaintiff initiated a lawsuit against the District requesting declaratory relief pertaining to Plaintiff's status as a duly elected representative of the District's Board for Area 3, the date of administration of Plaintiff's oath as a Board Member, the date Plaintiff was declared elected as a Board Member of Area 3 of the District, as well as the scope of authorization pertaining to Plaintiff's duties as a Board Member of Area 3 of the District, in the matter styled *Senovia Gutierrez v. Tulare Local Healthcare District, dba Tulare Regional Medical Center, Richard Torrez, Michael Jamaica, Kevin Northcraft, and Does 1-25, inclusive, Tulare County Superior Court case no. 271265* (the "Lawsuit").

3. After negotiation, the District and Plaintiff (collectively, the "Parties") have reached an agreement on a final stipulated judgment, to be entered by the Tulare County Superior Court, which would resolve all of the claims encompassed by the Lawsuit.

4. Relief from the automatic stay is required in order for the Parties to conclude the Lawsuit.

5. Accordingly, the District and Plaintiff have agreed to allow the Automatic Stay to be modified pursuant to the terms and conditions stated herein.

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3 **STIPULATION AND AGREEMENT**

4 NOW, THEREFORE, subject to Court approval, the parties hereby stipulate and  
5 agree as follows:

6 1. The Automatic Stay pursuant to 11 U.S.C. § 362 shall be modified to allow the  
7 Lawsuit to continue for the sole purpose of entering a final judgment and order for  
8 equitable and other relief.

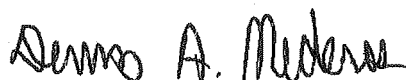
9 2. Any amendment to this Stipulation shall be made in writing, signed by the  
10 District and Plaintiff, and approved by the Court.

11 3. The District and Plaintiff stipulate to entry of an order approving this Stipulation  
12 subject to compliance with FRBP 4001, if required.

13 IT IS HEREBY STIPULATED AND AGREED.  
14

15  
16 October 23, 2018

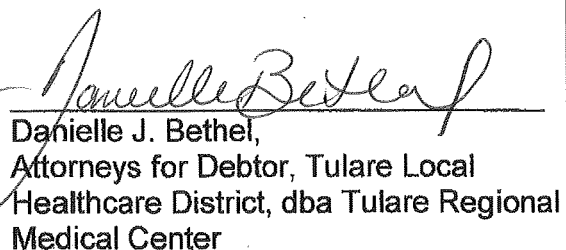
MEDEROS, SOARES & ORMONDE

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19 Dennis A. Mederos, Attorneys for  
20 Plaintiff, Senovia Gutierrez

21 October 24, 2018

22 WALTER WILHELM LAW GROUP,  
23 a Professional Corporation

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25 Danielle J. Bethel,  
26 Attorneys for Debtor, Tulare Local  
27 Healthcare District, dba Tulare Regional  
28 Medical Center